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Attorney for DEFENDANTS,
LINDA J. CURTIS, Trustee of the
PLKG CURTIS TRUST dated October 4, 2004

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PAMELA KOUSSA

Plaintiffs,

v.

PHILIP J. CURTIS, Trustee of the
PLKG CURTIS TRUST dated October 4,
2004; LINDA J. CURTIS, Trustee of the
PLKG CURTIS TRUST dated October 4,
2004; AND DAVID MAGNA, DBA DAVID
MAGNA WORKSHOP,

Defendants.

Case No.: 3:16-CV-02248-MEJ

JOINT STIPULATION TO STAY FILING
AND SCHEDULING DEADLINES, AND
ORDER THEREON

COME NOW, THE PARTIES, BY AND THROUGH THEIR ATTORNEYS, and hereby enter
into the following stipulations for the stay of filing and scheduling deadlines due to pending
settlement, with request for this court to adopt the same as the Order of the Court.

1. The Center for Disability Access represents Plaintiff PAMELA KOUSSA;
2. Douglas N. Smith of the Law Offices of Douglas N. Smith represents Defendant
LINDA J. CURTIS, Trustee of the PLKG CURTIS TRUST dated October 4, 2004.
3. Defendant PHILIP J. CURTIS, Trustee of the PLKG CURTIS TRUST dated October
4, 2004 is deceased and has been dismissed from the action.
4. The Parties are working out the material details of settlement.
5. The settlement negotiated by counsel shall resolve the entire action, and shall result in

the dismissal of Defendant DAVID MAGNA, dba DAVID MAGNA WORKSHOP.

6. Defendant Curtis' Responsive Pleadings are due July 21, 2016.

7. Under the Court's Scheduling Order, issued April 26, 2016, pursuant to General Order 56, ¶¶ 3, 4, the Last Day for the parties and counsel to hold the joint inspection of the premises is August 8, 2016.


8. In the interest of judicial economy and to minimize attorney's fees and costs, the parties wish to stay further proceedings, including the filing of responsive pleadings by Defendants and the Case Schedule, for 30 days, to allow the parties to finalize and effectuate settlement. The parties anticipate the settlement will be completed and a request for dismissal filed by that time.

9. The parties request this court approve the above stipulation, staying the deadline for Defendants to respond to the Summons and staying the Case Schedule for 30 days.

IT IS SO STIPULATED.

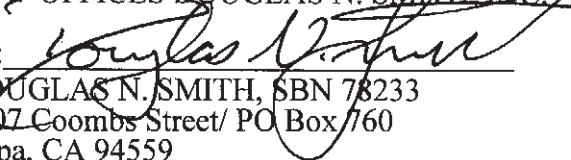
Date: July 21, 2016

CENTER FOR DISABILITY ACCESS

By: 
PHYL GRACE, SBN 171771
PO Box 262490
San Diego CA 92196-2490
Attorneys for Plaintiff KOUSSA

Dated July 21, 2016

LAW OFFICES DOUGLAS N. SMITH INC.

By: 
DOUGLAS N. SMITH, SBN 78233
1207 Coombs Street/ PO Box 760
Napa, CA 94559
(707) 257-8935
Attorney for Defendant CURTIS

ORDER

IT IS SO ORDERED.

Date: July 22, 2016


MARIA-ELENA JAMES
United States Magistrate Judge

1 I hereby attest that I have on file all holographic signatures corresponding to any
2 signatures indicated by a conformed signature (/S/) within this e-filed document.

3 Dated July 21, 2016

LAW OFFICES DOUGLAS N. SMITH, INC.

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